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November 15, 1994

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FCC MAIL ROOM

William F. Caton, Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

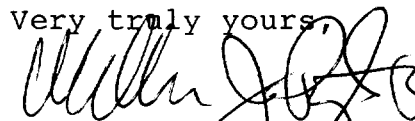
RE: Petition for Rule Making Seeking FM Allotment Changes

Dear Mr. Caton:

Transmitted herewith, on behalf of KBFL Broadcasting Company and KHST Broadcasting Company, are an original and four (4) copies of a "**Joint Petition for Rule Making**" seeking changes in the Commission's Table of FM Allotments.

Should there be any questions regarding this matter please do not hesitate to contact the undersigned.

Very truly yours,



William J. Pennington, III
COUNSEL TO KBFL BROADCASTING COMPANY
COUNSEL TO KHST BROADCASTING COMPANY

Enc.

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Before the
FEDERAL COMMUNICATIONS COMMISSION FCC MAIL ROOM

Washington, DC 20554

In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket No.
FM Table of Allotments) RM-
(Buffalo and Lamar, Missouri))

To: Chief, Policy and Rules Division

JOINT PETITION FOR RULE MAKING

KBFL Broadcasting Company, licensee of Station KBFL(FM) at Buffalo, Missouri, and KHST Broadcasting Company, licensee of Station KHST(FM) at Lamar, Missouri, respectfully request that the Commission amend Rule 73.202(b), the FM Table of Allotments, to (i) substitute Channel 260C3 for Channel 260A at Buffalo, Missouri and modify the license of Station KBFL(FM) accordingly to specify operation on Channel 260 with Class C3 facilities, and (ii) substitute Channel 269A for Channel 260A at Lamar, Missouri and modify the license of Station KHST(FM) accordingly to specify operation on Channel 269A.

In support of this allocation request, the following information is respectfully submitted:

1. As is demonstrated in attached Exhibit 1, Channel 260C3 may be substituted for Channel 260A at Buffalo at the petitioners desired coordinates if the above mentioned channel change is made at Lamar. The petitioners desired antenna site is

site restricted 8.0 kilometers south southeast of the community of Buffalo.

2. Exhibit 2 shows that Channel 269A may be substituted for 260A at Lamar at the present KHST(FM) antenna site. The licensee of KHST(FM), KHST Broadcasting Company, is made up of the same principals which own KBFL Broadcasting Company, the KBFL(FM) licensee. Thus, there is no objection to the allotment changes requested herein and no need for the Commission to issue an Order to Show Cause. The expenses involved in the proposed change in frequencies for KHST(FM) will naturally be borne by the same principals that are licensees of both stations.

3. The allotment of channel 260C3 to Buffalo, and modification of KBFL(FM)'s license to specify operation thereon, will permit the station to serve a much larger area, thereby increasing the number of broadcast signals available to the public in the given area and thus promoting efficient use of the spectrum. The Commission has determined that expanded service to the public and spectrum efficiency provide specific public benefits. See Report and Order in MM Docket No. 85-313, 60 RR 2d 114, 118 (1986). Thus, this joint proposal would serve the public interest.

4. If Channel 260C3 is substituted for Channel 260A at Buffalo, the permissible antenna site area for a station operating on Channel 260C3 in that community would be ample. The area where an antenna could be located is close enough so that a station operating on Channel 260C3 should have no difficulty

placing a 70 dBu service contour over the entire community of Buffalo. Complete line of sight coverage would also be provided the community of Buffalo.

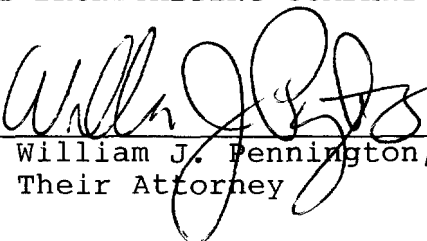
5. Because Channel 260C3 would not be available to a third party for use at Buffalo, KBFL(FM)s license may be modified to specify operation on the higher class channel pursuant to Rule 1.420(g). Upon grant of this KBFL Broadcasting Company will proceed promptly with filing an application seeking the upgraded facilities and when granted the construction permit immediately construct the upgrade. KHST Broadcasting Company will also immediately file an application seeking to effecuate the changes outlined herein for KHST(FM). When granted those changes, KHST(FM) will immediately implement them.

Based on the foregoing, KBFL Broadcasting Company and KHST Broadcasting Company hereby respectfully request that the Commission modify its FM Table of Allotments to (i) substitute Channel 260C3 for Channel 260A at Buffalo, Missouri and modify the license of Station KBFL(FM) accordingly, and (ii) substitute Channel 269A for Channel 260A at Lamar, Missouri and modify the license for Station KHST(FM) accordingly.

Respectfully submitted,

KBFL BROADCASTING COMPANY
KHST BROADCASTING COMPANY

By:

A handwritten signature in black ink, appearing to read "William J. Pennington, III", written over a horizontal line.

William J. Pennington, III
Their Attorney

5519 Rockingham Road-East
Greensboro, NC 27407
(910) 299-5257

November 15, 1994

CHANNEL SEPARATION REQUIREMENTS**CHANNEL 260C3 BUFFALO, MISSOURI****REFERENCE COORDINATES****NORTH LATITUDE 37-35-30****WEST LONGITUDE 93-02-30**

| <u>CHANNEL</u> | <u>STATUS</u> | <u>STATION OR ALLOTMENT</u> | <u>SEPARATION (KM)</u> | |
|----------------|---------------|-----------------------------|------------------------|---------------|
| | | | <u>REQUIRED</u> | <u>ACTUAL</u> |
| 261C2 | CP | KJMO JEFFERSON CITY, MO | 117.0 | 117.46 |
| 259C2 | LIC | KMAC GAINESVILLE, MO | 117.0 | 121.83 |
| 263C2 | LIC | KGMV AURORA, MO | 56.0 | 69.48 |
| 206C | LIC | KWFC SPRINGFIELD, MO | 31.0 | 44.60 |
| 258A | LIC | KADI REPUBLIC, MO | 42.0 | 56.77 |
| 259C3 | CPM | KZYQ ST. JAMES, MO | 99.0 | 132.33 |
| 261A | LIC | KRLK CASSVILLE, MO | 89.0 | 126.71 |
| 257C2 | CP | KUNQ HOUSTON, MO | 56.0 | 105.09 |

CHANNEL SEPARATION REQUIREMENTS**CHANNEL 269A LAMAR, MISSOURI****REFERENCE COORDINATES**

NORTH LATITUDE 37-25-27
WEST LONGITUDE 94-16-12

| <u>CHANNEL</u> | <u>STATUS</u> | <u>STATION OR ALLOTMENT</u> | <u>SEPARATION (KM)</u> | |
|----------------|---------------|-----------------------------|------------------------|---------------|
| | | | <u>REQUIRED</u> | <u>ACTUAL</u> |
| 270C2 | CP | KKZQ LOWELL, AR | 106.0 | 112.24 |
| 269C2 | APP | KEGS EMPORIA, KS | 166.0 | 186.23 |
| 267C | LIC | KTXR SPRINGFIELD, MO | 95.0 | 121.09 |
| 270C2 | APP | KBMX ELDON, MO | 106.0 | 176.07 |
| 268C1 | APPM | KARO COLUMBIA, MO | 133.0 | 239.38 |